

EXHIBIT 4

RICHARD ROGERS vs BNSF RAILWAY COMPANY

30(b)(6), Confidential

Carlos Reyes on 12/04/2020

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1 Q. Did you purchase software to be used at
2 the AGS systems in Illinois?

3 A. There's a software license that is --
4 that is part of that agreement. So we have a --
5 sorry.

6 Q. Go ahead.

7 MS. HERRINGTON: Wait for a question,
8 Carlos. Have him ask a question.

9 THE WITNESS: I'm sorry.

10 MS. HERRINGTON: Unless you wanted to
11 finish your answer. Sorry.

12 THE WITNESS: No. I'm done.

13 MR. GERBIE: Beth, I'd ask that you not
14 coach the witness. Thank you.

15 MS. HERRINGTON: Not coaching. I
16 thought he was done with his answer.

17 QUESTIONS BY MR. GERBIE:

18 Q. Mr. Reyes, it sounds like you're
19 familiar with the AGS system's use of biometrics;
20 is that right?

21 A. I'm familiar with the -- generally how
22 it works, yes. I'm familiar with the process.

23 Q. Could you explain the process of how
24 that works?

25 A. Yes. So the -- when a driver comes to

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1 our facility, let's say for the first time, at an
2 AGS location, they would come in to register --
3 for registration, because the AGS system provides
4 a heightened level of security and authentication
5 for the person performing the transaction. So
6 they would -- they would come in and register by
7 providing a current driver's license. Their photo
8 is taken at that time, and then they scan two
9 fingers on a reader. That is -- that records a
10 registration record.

11 Then, when they come into the facility
12 and enter into the kiosk area, they would type in
13 their ID, whatever their ID is that their company
14 records in a national database for truck drivers,
15 and select the company that they work for in the
16 kiosk, and then scan their finger on a finger
17 scanner at the kiosk. And there's a match that is
18 performed or attempted to perform against the
19 registration to validate that driver.

20 Q. Where -- strike that.

21 You said the drivers need to register
22 their fingerprints prior to using the kiosks at
23 the AGS systems; is that correct?

24 MS. HERRINGTON: Objection to form.

25

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1 A. Four intermodal facilities.

2 Q. Four intermodal facilities.

3 And at each of those intermodal
4 facilities, is there a driver assistance building?

5 A. Let's see here. I believe so. I have
6 not been to Cicero. I can't recall if Cicero has
7 a separate driver assistance building.

8 There are some cases where the driver
9 assistance building or the driver assistance area
10 is in a common building. Those are typically our
11 smaller facilities which are not any of the
12 Chicago locations, but each of the -- Willow
13 Springs, Corwith, and Logistics Park Chicago
14 would -- I would say would have had a driver
15 assistance building.

16 I know that in recent -- in the recent
17 years, Remprex has moved a big part of their
18 operations to a centrally located operating center
19 in Chicago where they are performing the driver
20 assistance remotely from that -- from that
21 building.

22 And there are -- there's still an area
23 where a driver would go outside the kiosk, the
24 transaction area, and walk up to a kiosk and
25 interact with the Remprex employee at that